

February 28, 2025

VIA ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Bartlett v. Société Générale de Banque au Liban S.A.L.*, Case No. 19-cv-0007
Joint Status Report**

Dear Judge Merkl:

Plaintiffs and Moving Defendants¹ respectfully submit this joint letter pursuant to the Court's November 18, 2024, Minute Order directing the parties "to meet and confer about the proposed discovery order beginning on or before 1/24/2025 and to submit the proposed discovery order to the Court or, in the alternative, to file a joint status report by 2/28/2025."

On December 18, 2024, Plaintiffs circulated their proposed discovery order to Moving Defendants. In January 2025, Moving Defendants began the process of producing documents to Plaintiffs on a rolling basis. On January 24, 2025, the parties met and conferred regarding Plaintiffs' proposed discovery order, to which Moving Defendants verbally shared their counterproposal discovery order. On February 21, 2025, Moving Defendants shared their written counterproposal discovery order with Plaintiffs, and the parties met and conferred that same day. On February 24, 2025, and February 27, 2025, Plaintiffs and Moving Defendants, respectively, exchanged written correspondence with proposals to narrow outstanding disagreements concerning (1) the proposed discovery order and (2) various other discovery issues. The parties again met and conferred on February 27, 2025.

Although the parties have committed to further meet and confer in an effort to further narrow disagreements, the parties have reached an impasse regarding the proposed discovery order. Accordingly, the parties jointly write to respectfully request that the Court set a schedule to allow the parties to brief the merits of their competing discovery order proposals,² as follows:

- On April 9, 2025, the parties shall file simultaneous opening letter briefs, no longer than five pages, single-spaced, in support of their competing proposals for a modified discovery order (exclusive of exhibits).

¹ Moving Defendants are (1) Société Générale de Banque au Liban S.A.L. ("SGBL"), (2) Fransabank S.A.L., (3) MEAB Bank s.a.l., (4) BLOM Bank S.A.L., (5) Byblos Bank S.A.L., (6) Bank Audi S.A.L., (7) Bank of Beirut S.A.L., (8) LGB Bank s.a.l., (9) Banque Libano-Française S.A.L., (10) Bank of Beirut and the Arab Countries S.A.L., and (11) Fenicia Bank S.A.L.

² Plaintiffs and SGBL note that the merits of the competing discovery order proposals will include the SGBL-specific issues.

- Simultaneous responses, no longer than five pages, single-spaced, to these letter briefs shall be due by April 30, 2025 (exclusive of exhibits).

Respectfully submitted,

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